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September 26, 2005

Hon. Bernard Zimmerman U.S. Magistrate Judge U.S. District Court, Northern District of California 450 Golden Gate Avenue, 15th Floor San Francisco, CA 94102

Re:

Ursua, et al. v. Alameda County Medical Center, et al.

U.S. District Court Case No. C-04-3006 BZ

Administrative Request

Dear Judge Zimmerman:

Having first directed this request to your clerk, Lashonda Scott, I am now requesting the Court's permission to file <u>one</u> narrative Statement of Facts (I am not referring to the Separate Statement of Undisputed Facts but, rather, the factual narrative in our brief) that will serve for all three of the plaintiffs' legal memoranda in opposition to the three separate motions for summary judgment now pending with the court (hearing date 10/26/05).

Plaintiffs' appreciate that they are limited to a total of three 25-page memoranda in opposition. By consolidating the Statement of Facts, it is plaintiffs' goal to respond in less than a total of 75 pages to all three motions, but under no circumstances to utilize any more than the 75 pages.

Pursuant to Ms. Scott's suggestion, I've attached a proposed order, if you are agreeable.

Very truly yours,

STAN CASPER

SC:slf Enclosure

cases.04:04-63:000085B2BZDDQGHBAnt0910 Filed099/20/20505Pageage52of2 1 Stan Casper (State Bar No. 56705) CASPER, MEADOWS, SCHWARTZ & COOK 2 A Professional Corporation California Plaza 3 2121 North California Blvd., Suite 1020 Walnut Creek, California 94596 4 Telephone: (925) 947-1147 Facsimile: (925) 947-1131 5 Attorneys for Plaintiffs 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 10 ESTATE OF ERLINDA URSUA, and Case No. 3:04-CV-3006-BZ 11 LORENZO URSUA, individually and as Executor for the ESTATE OF ERLINDA 12 URSUA; ROXANNA BAUTISTA; and {|PŔOPOSED| ORDER RE RHODORA URSUA, 13 PLAINTIFFS' ADMINISTRATIVE Plaintiffs. REQUEST 14 VS. 15 ALAMEDA COUNTY MEDICAL CENTER; 16 COUNTY OF ALAMEDA; RENEE PAVON; ABC SECURITY SERVICE, INC.; and 17 DOES 1 through 100, 18 Defendants. IT IS HEREBY ORDERED, that in responding to the three defendants' motions 19 for summary judgment, plaintiffs' are permitted to file one factual narrative brief 20 applicable to all the defendants' motions, along with three separate legal memoranda. 21 The total pages of the four documents may not exceed 75 pages. 22 DISTR 23 DATED: September 27, 2005 24 25 Hon. Bernard United States Judge Bernard Zimmerman 26 27

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Estate of Erlinda Ursua et al. v. Alameda County Medical Center, No. 3:04-CV-3006-BZ [Proposed] Order re Plaintiffs' Administrative Request

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